City of Alameda California

April 18, 2005

Anthony J. Landis. P.E.
Chief
Office of Military Facilities
Northern California Operations
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Dear Tony:

This letter is a follow up to our meeting on February 24, 2005 with DTSC, USEPA and the Navy regarding RCRA/CERCLA integration issues at Alameda Point. We are pleased with the progress to date toward more fully integrating DTSC's administration of its Site Mitigation and RCRA Permitting programs at Alameda Point. As you requested, we have prepared this letter identifying issues that the ARRA believes should be addressed in the "clarification" letter that DTSC will be writing to the Navy. The basis for many of the issues identified below is the Navy's May 7, 2003 *Final Technical Memorandum: Evaluation of Issues Related to the RCRA Facility Permit, Tiered Permits, and Non-Permitted Areas at Alameda Point.* Hence, for convenience, we have grouped the ARRA's questions and issues according to type of site to which they pertain.

- Tiered Permit Units:

  o Closure verification from DTSC for Tiered Permit Unit TP-09 is needed.

  o To our knowledge, Alameda County has not officially concurred with closure of any Tiered Permit units. Does the Navy (or future property owner) need Alameda County's concurrence, or is DTSC concurrence sufficient?

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Development Services Department

- Permitted Units:

  o Will DTSC handle contamination outside the Permitted Unit from which the contamination migrated as a Corrective Action, or via a Post-Closure Permit?

  o Does DTSC concur that there is no subsurface contamination associated with Permitted Units IWTP-25 and IWTP-32?

  o Is DTSC agreeable to handling remediation of soil and groundwater contamination at, and closure of, Permitted Unit Area 37 (UST[R]-07) under the RWQCB's Petroleum Remediation program (CAA-11)?

  o Will DTSC handle remediation of soil and groundwater contamination at, and closure of, the former Permitted Unit IWTP-360 under the Site Mitigation program and in concert with the CERCLA process (IR-4)?

- USTs, ASTs, and Fuel Lines:

  o Is DTSC agreeable to handling petroleum-only USTs, ASTs, and fuel lines under the RWQCB's Petroleum Remediation program?

  o Does DTSC concur that all petroleum-only USTs, ASTs, and fuel lines that have been closed by the RWQCB under the Petroleum Remediation Program will remain closed, and will not be re-opened by the DTSC?

  o Does DTSC concur that the TPH Strategy document (May 2001) will not be revisited by the DTSC, and that the program will be implemented by the RWQCB?

- Non-Permitted SWMUs, including Oil/Water Separators and Washdown Areas, outside CERCLA site boundaries:

  o Will DTSC handle these units through the Site Mitigation program if they involve more than petroleum?

  o Is DTSC agreeable to handling the units that handled only petroleum through the RWQCB's Petroleum Remediation program?

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o   Does DTSC concur with Navy's current NFA recommendations?

- Non-Permitted SWMUs, including Oil/Water Separators and Washdown Areas, within CERCLA site boundaries:

    o   Will DTSC handle these units through the Site Mitigation program in conjunction with USEPA and within the ongoing CERCLA process?

    o   Does DTSC concur with Navy's current NFA recommendations for these units?

Thank you for any clarification you can provide. We look forward to enhanced regulatory efficiency as a result of your efforts. If you have any questions or need additional information please call me at (510)749-5833.

Sincerely,

Debbie Potter
Base Reuse and Redevelopment Manager

DP:mjk

cc: Stephen Proud, Alameda Point Project Manager
    Peter Russell, Russell Resources
    Randy Brandt, LFR
    Ellen Garber, Shute, Mihaly & Weinberger
    Aidan Barry, Alameda Point Community Partners
    Ron Plaseied, BRAC PMO
    Thomas Macchiarella, BRAC PMO

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